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26 Attorneys for Defendant
27 VASILE MEREACRE

28 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VASILE MEREACRE,

Defendant.

Case No. CR 18-348 LHK (NC)

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE**

1 IT IS HEREBY STIPULATED by the parties through their counsel that defendant
2 VASILE MEREACRE may reside and be supervised in the Southern District of Florida
3 in lieu of the Middle District of Florida.

4 By way of background, and in support of this stipulation, Defendant states the
5 following:

6 1. Defendant is charged by Indictment with Conspiracy to Violate 18 U.S.C. §§
7 1030(a)(7)(B) and (c)(3)(A) and Extortion Involving Computers in violation of 18 U.S.C.
8 §§ 1030(a)(7)(B) and (c)(3)(A) in this District under Case No.: CR-18-00348-LHK.

9 2. On October 16, 2018, Defendant was taken into federal custody in the Southern
10 District of Florida based on the arrest warrant in the above captioned case.

11 3. On October 22, 2018, Magistrate Judge Patrick A. White (Southern District of
12 Florida) released Defendant on bond with the following conditions of pre-trial release
13 pursuant to a stipulation between the United States and Defendant:

14 a. \$250,000.00 Personal Surety Bond co-signed by Defendant's parents,
15 Nicolae and Liuba Mereacre;

16 b. \$100,000.00 Corporate Surety Bond secured by Defendant's parents
17 property located in Palm Coast, Florida;

18 c. Defendant to reside at 109 Laguna Forest Trail, Palm Coast, Florida
19 32164 (Middle District of Florida) during the pendency of the case;

20 d. Home Confinement monitoring;

21 e. Defendant shall post a \$25,000.00 cashier's check payable to the Clerk
22 of U.S. District Court for the Middle District of Florida within 48 hours of his
23 release from custody;

24 f. Report to Pre-Trial Services as directed in the Middle District of Florida
25 with the following special conditions:

26 i. Surrender all passports and travel documents;

27 ii. No computer access except for communicating with his counsel;

iii. Defendant shall report weekly in person or by telephone to his counsel.

g. Defendant shall appear before the Honorable Susan van Keulen, United States Magistrate Judge in the Northern District of California on November 8, 2018 at 1:30 p.m. at 280 South First Street, San Jose, California 95113.

4. On October 24, 2018, Defendant filed an Unopposed Motion to Modify Conditions of Pretrial Release (see FLSD 1:18-MJ-03533 AOR, ECF Doc 11) requesting the modifications noted below. On October 25, 2018, the Honorable Patrick A. White denied that motion without prejudice, noting that the “motion may be re-filed in the Northern District of California, where jurisdiction in this case lies.” (See FLSD 1:18-MJ-03533 AOR, ECF Doc 12).

5. Defendant therefore requests this Court to modify his pre-trial release conditions as follows:

a. Allow Defendant to reside and be supervised in the Southern District of Florida as follows: Defendant is allowed to reside at 316 NW 36th Street, Oakland Park, Florida 33309 until October 10/30/2018; thereafter, he may reside at 180 Northeast 29th Street, Unit 304, Miami, Florida, 33137 (both residences which are in the Southern District of Florida). He shall report to Pretrial Services in the Southern District of Florida.

b. Impose a curfew to Defendant's home confinement between the hours of 10:00 p.m. and 6:00 a.m.

c. Allow Defendant to make cashier's check payable to the United States District Court for the Southern District of Florida in lieu of the Middle District of Florida.

6. Undersigned counsel have conferred with AUSA Susan Knight who agrees to the requests set forth in this stipulation.

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1 SO STIPULATED:

2
3 Dated: October 25, 2018

_____/s/_____
Christopher G. Lyons
Ronald Gainor
Adam Pennella
Counsel for Vasile Mereacre

6
7 Dated: October 25, 2018

ALEX G. TSE
Acting UNITED STATES ATTORNEY

8
9
10 _____/s/_____
Susan Knight
Assistant United States Attorney

11
12
13 SO ORDERED:

14
15 Dated:

Honorable Nathaniel Cousins
United States Magistrate Judge